

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:16-CR-224
)	
Plaintiff,)	
v.)	JUDGE PATRICIA A. GAUGHAN
)	
BOGDAN NICOLESCU, et al.)	
)	
Defendant.)	UNITED STATES OF AMERICA'S
)	OMNIBUS REPLY FOR EARLY
)	PRODUCTION OF WITNESS
)	MATERIALS

Now comes the United States of America, by its counsel, Justin E. Herdman, United States Attorney, Duncan T. Brown and Brian M. McDonough, Assistant United States Attorneys, and Brian L. Levine, Senior Counsel for the U.S. Department of Justice, and hereby submits this Omnibus Reply to Requests for Early Production of Witness Materials. (Dks. 119, 120, and 121).

Given the unique nature and circumstances of this case, the government does not oppose Nicolescu's requests for early production of witness materials.

The government anticipates being able to produce grand jury transcripts (which constitute entirely of testimony from individuals who will be witnesses at trial) and exhibits by on or about **February 22, 2019**.

Because the government anticipates calling over 40 witnesses, compiling Jenks and Giglio material will take longer. The government believes it will have Jenks and Giglio materials ready for production by on or about **March 15, 2019**, but will produce those materials as soon as they become available.

In order to ensure access to these documents is timely and meaningful for preparation, the United States will provide said materials to counsel for Radu Miclaus on this schedule as well.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

By: /s/ Brian L. Levine
Brian L. Levine (DC: 480216)
Senior Counsel
United States Department of Justice
1301 New York Avenue, Suite 600
Washington, DC 20005
(202) 616-5227
(202) 514-6113 (facsimile)
Brian.Levine@usdoj.gov

Duncan T. Brown (NY: 3982931)
Assistant United States Attorney
United States Court House
801 West Superior Avenue, Suite 400
Cleveland, OH 44113
(216) 622-3933
(216) 522-7499 (facsimile)
Duncan.Brown@usdoj.gov

Brian M. McDonough (OH: 0072954)
Assistant United States Attorney
United States Court House
801 West Superior Avenue, Suite 400
Cleveland, OH 44113
(216) 622-3965
(216) 522-2403 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February, 2019, a copy of the foregoing Omnibus Response was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Duncan T. Brown

Duncan T. Brown

Assistant United States Attorney